

# EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|                          |   |                        |
|--------------------------|---|------------------------|
| UNITED STATES OF AMERICA | ) |                        |
|                          | ) |                        |
| V.                       | ) | Crim. No. 1:13-CR10258 |
|                          | ) |                        |
| MARSHALL DION            | ) |                        |
|                          | ) |                        |
|                          | ) |                        |

**AFFIDAVIT OF MARSHALL DION**

The undersigned affiant being aggrieved by unlawful searches, seizures, arrests, and interrogations, in reserving his constitutional privilege against self incrimination, hereby on oath, deposes and states the following:

1. I am the defendant in the above entitled matter;
2. The police stopped me on the highway in Kansas claiming that I was speeding. I was travelling in the flow of traffic and other vehicles were passing me. Officer Blake was traveling in the opposite direction and then turned around to stop me;
3. After stopping my truck Officer Blake began questioning me about my travels;
4. I provided all of my documents to officer Blake and all were in good order;
5. Officer Blake ordered me to get out of my truck and detained me in his patrol car;
6. Officer Blake interrogated me for over 20 minutes investigating my statements and examining me about personal matters, travel matters, financial matters;
7. I was not free to leave and believed that Officer Blake was going to search me and my truck;
8. Officer Blake had his dog with him and he made clear that he was looking for drugs;
9. When Officer Blake told me I could leave I expected he was going to search my car and have the dog peruse the area around my car;
10. Having no choice I offered and agreed to let him look;
11. When I attempted to stop him he continued and had more of his colleagues come to the scene;

12. I believed I was going to be searched and then arrested;
13. I did not freely give consent to searching my property and I did not agree to be interrogated or detained;
14. While in custody I repeatedly told Officer Blake I could not talk to him, however, he kept initiating conversation;
15. I requested a lawyer multiple times and Officer Blake made clear that I would not be provided access to a lawyer;
16. I have an expectation of privacy in the properties and items listed in the suppression motions, and I object to all of the searches listed.
17. I also have a possessory interest in all of the properties and items listed for suppression.

Signed under the pains and penalties of perjury,

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Marshall Dion